

David A. Boone, CSBN. 74165
Fanny Zhang, CSBN. 277606
LAW OFFICES OF DAVID A. BOONE
1611 The Alameda
San Jose, CA 95126
Telephone: (408) 291-6000
Facsimile: (408) 291-6016

Attorney for Debtor(s),

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE:)	CHAPTER 13
)	
QUANG KY NGUYEN)	CASE NO.: 16-52743 MEH
)	
Debtor.)	OBJECTION TO TRUSTEE'S
)	MOTION TO DISMISS AND
)	REQUEST FOR HEARING

TO THE HONORABLE M. ELAINE HAMMOND, UNITED STATES BANKRUPTCY COURT JUDGE, THE CHAPTER 13 TRUSTEE, AND OTHER INTERESTED PARTIES:

1. The Chapter 13 Trustee (hereinafter "Trustee") filed a motion (hereinafter "Motion") requesting that this Court dismiss this case for cause pursuant to 11 U.S.C. § 1307(c)(1), alleging the failure by the debtor(s) to resolve the objections.

2. Debtor(s) filed this case in good faith on September 22, 2016, and has prosecuted this case in good faith. Debtor has, among other things, filed the amendments to attempt to resolve the objections in the case. Debtor has amended all her schedules and is waiting for the Chapter 13 Trustee to review.

(a) To ensure that debtor(s) has adequate time to resolve any possible amended objection(s), that the hearing be scheduled on Trustee's Motion no sooner than sixty (60) days from today;

(b) At the hearing the Trustee's Motion be denied; or in the alternative

(c) For other such relief as this Court deems just and proper.

1 Dated: June 6, 2017

LAW OFFICES OF DAVID A. BOONE

2
3 /s/ David A. Boone
4 DAVID A. BOONE
5 Attorney for Debtor(s)
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28